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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA *ex rel.*
PEGGY THORNTON, Relator,

and

PEGGY THORNTON,

Plaintiff,

vs.

PORTOLA DEL SOL OPERATOR, LLC, a
foreign limited-liability company; TMIF II
PORTOLA, LLC, a foreign limited-liability
company; APARTMENT MANAGEMENT
CONSULTANTS, LLC, a foreign limited
liability company; and RENE
RICHARDSON, as AGENT of PORTOLA
DEL SOL OPERATOR, LLC,

Defendants.

Case No. 2:21-cv-01123-APG-BNW

**Stipulation and Order to Extend Deadline
for Plaintiff Peggy Thornton and
Defendants Apartment Management
Consultants, LLC and Rene Richardson to
submit Reply supporting their Joint
Motion to Approve Settlement and
Distribution of Settlement Funds
[ECF No. 124]**

(Fifth Request)

1 Defendants Apartment Management Consultants, LLC and Rene Richardson (collectively
2 “AMC”); Defendant TMIF II Portola, LLC (“TMIF”); Plaintiff-Relator Peggy Thornton; and
3 Real Party in Interest the United States of America, by and through their respective undersigned
4 counsel, hereby stipulate to extend Ms. Thornton and AMC’s deadline to submit their reply in
5 support of their joint motion to approve settlement and distribution of settlement funds (“Joint
6 Motion”) by 30 days until **June 2, 2025**, with the following background and reasons:

7 1. Ms. Thornton and AMC submitted the Joint Motion (ECF No. 124) on January 8,
8 2025.

9 2. As explained in the Joint Motion, Ms. Thornton and AMC have agreed on a
10 settlement amount to resolve claims against the latter but required Court approval given that the
11 United States had not stated whether it had any objection to the settlement terms.

12 3. The United States subsequently filed a partial objection to the Joint Motion, stating
13 that it does *not* ultimately object to settlement or the settlement amount but requires any
14 settlement to conform to its specifications, including distribution of settlement funds directly to
15 the United States. ECF No. 128.

16 4. The United States, Ms. Thornton, and AMC have since conferred and agreed to
17 jointly work on a written settlement agreement based on the Government’s specifications.

18 5. Because the settlement agreement will moot the need for the Court to approve the
19 settlement and to accommodate the time needed to complete that agreement, the United States,
20 Ms. Thornton, and AMC stipulated to extend the time for Ms. Thornton and AMC to reply to the
21 Joint Motion to February 20, 2025. ECF Nos. 131-32.

22 6. Shortly after the Court approved that stipulation, TMIF submitted its own “limited
23 opposition” to the Joint Motion. ECF No. 133.

24 7. To likewise accommodate drafting the settlement agreement, Ms. Thornton, AMC,
25 and TMIF stipulated to extend Ms. Thornton and AMC’s reply deadline (with respect to TMIF’s
26 limited opposition) to February 20, 2025 – thus aligning with the deadline as to the Government’s
27 limited objection. ECF No. 134-35.

8. The Government circulated a proposed settlement agreement shortly thereafter, and prior to the last stipulated extension (ECF Nos. 138–39), AMC provided the Government with requested edits to the settlement agreement.

9. **Since the last stipulated extension**, the Government, AMC, and Ms. Thornton have worked cooperatively to reconcile these requested edits and have narrowed the issues down to the wording of two provisions. The Government’s counsel is working with their counterparts at the Department of Justice on the two remaining provisions, and the settling parties believe the settlement agreement can soon be finalized.

10. Accordingly, all parties and the United States agree to extend AMC and Ms. Thornton’s deadline to file a reply in support of the Joint Motion until June 2, 2025.

11. Ms. Thornton, AMC, TMIF, and the United States agree that this stipulation is entered into in good faith and will not unduly delay proceedings.

IT IS SO STIPULATED.

Dated: May 1, 2025

SNELL & WILMER L.L.P.

By: /s/ Gil Kahn

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Dated: May 1, 2025

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Attorneys for Relator

1
2 Dated: May 1, 2025

Dated: May 1, 2025

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10 *Attorneys for Real Party in Interest*
11 *the Unites States of America*

ORDER

12 Good cause appearing, Ms. Thornton and AMC's stipulation is **GRANTED**.
13 Ms. Thornton and AMC's deadline to submit a reply in support of their Joint Motion (ECF
14 No. 124), with respect to both the United States' partial objection (ECF No. 128) and TMIF's
15 limited opposition (ECF No. 133), is extended to and including June 2, 2025.

16 **IT IS SO ORDERED.**

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CHIEF UNITED STATES DISTRICT JUDGE

20 DATED: May 2, 2025
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